

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE :
 :
WILLIAM WOODWARD : CHAPTER 13
Debtor. :

NATIONSTAR MORTGAGE, LLC, :
D/B/A MR. COOPER :
 :
Movant, :
 :
vs. :
WILLIAM WOODWARD : CASE NO. 5-20-02361
 :
Respondents. :

DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, William Woodward, the Debtor, and files an Answer to Nationstar Mortgage's Motion for Relief From the Automatic Stay:

1. William Woodward (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor's counsel is in the process of contacting the Debtor to ascertain if the payments have been made, or if Debtor is in possession of the funds needed to cure the default.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: December 22, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 22, 2020, he caused a true and correct copy of Debtor's Answer to Nationstar Mortgage's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Rebecca A. Solarz, Esquire at rsolarz@kmlawgroup.com

Dated: December 22, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire